

Filed Under Seal

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

SHARON JONES : VIOLATIONS:
18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D)
: (dealing in firearms without a license – 1
count)
: 18 U.S.C. § 924(a)(1)(A) (making false
statements to a federal firearms licensee – 6
: counts)
Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about July 23, 2020 and to on or about September 4, 2020, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SHARON JONES

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNTS TWO THROUGH SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. The Bunker Gun Shop, 549 York Road, Warminster, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.

2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

3. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 (“Form 4473”). Part of the Form 4473 requires that the prospective purchaser certify that all of his or her answers on Form 4473 are true and correct. The buyer is required to include his or her home address. The Form 4473 contains language warning that, “I understand that answering ‘yes’ to question 11.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law,” “making any false oral or written statement, or the exhibiting of any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony,” and “I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law.”

4. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth, to ensure that the person was not prohibited from

purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

5. On or about the dates listed below, in Warminster, in the Eastern District of Pennsylvania, defendant

SHARON JONES,

in connection with the acquisition of each of the firearms listed below from The Bunker Gun Shop, located at 549 York Road, Warminster, Pennsylvania, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders' records, in that defendant SHARON JONES, certified on the Form 4473 that she was the actual transferee/buyer, and that her address was 3124 Hartville Street, Philadelphia, Pennsylvania, when in fact, as defendant knew, these statements were false and fictitious, because JONES was purchasing the firearms for the purpose of resale for profit, and because JONES did not reside at 3124 Hartville Street, Philadelphia, Pennsylvania, each date constituting a separate offense:

Count	Date	Firearm	Serial Number
Two	7/23/2020	Glock, Model 17, 9mm semi-automatic pistol	BPGY467
	7/23/2020	SCCY, Model CPX-2, 9mm semi-automatic pistol	942021
Three	7/28/2020	Taurus, Model G3C, 9mm semi-automatic pistol	ABG711212
Four	7/30/2020	Sig Sauer, Model P365, 9mm semi-automatic pistol	66A153453
	7/30/2020	Canik, Model TP9SFx, 9mm semi-automatic pistol	20BC24501
	7/30/2020	Springfield, Model XDs, 9mm semi-automatic pistol	BY219829
Five	8/6/2020	Glock, Model 40, 10mm semi-automatic pistol	BNNX268
	8/6/2020	FOZ, Model 75, 9mm semi-automatic pistol	D328535
	8/6/2020	EAA, Model Pavona, 9mm semi-automatic pistol	EAA01531

	8/6/2020	RIA, Model 2011, .45 caliber semi-automatic	RIA1498898
Six	8/17/2020	Glock, Model 23, .40 caliber semi-automatic pistol	BPKD312
	8/17/2020	CK Arms, Model P09, 9mm semi-automatic pistol	C530802
	8/17/2020	CK Arms, Model P10F, 9mm semi-automatic pistol	D304915
	8/17/2020	Canik, Model TP9SFx, 9mm semi-automatic pistol	20BC28270
Seven	9/4/2020	Glock, Model 43X, 9mm semi-automatic pistol	BPTR42
	9/4/2020	Ruger American, 9mm semi-automatic pistol	863-05091
	9/4/2020	SCCY, Model CPX-2, 9mm semi-automatic pistol	C007925
	9/4/2020	Smith & Wesson, Model MP20, 9mm semi-automatic pistol	NHB1077
	9/4/2020	Glock, Model 23, .40 caliber semi-automatic pistol	AESP709

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(A), set forth in this indictment, defendant

SHARON JONES

shall forfeit to the United States of America, the firearms and other items involved in the commission of such violations, including, but not limited to:

- 1) A Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BPGY467;
- 2) An SCCY, Model CPX-2, 9mm semi-automatic pistol, bearing serial number 942021;
- 3) A Taurus, Model G3C, 9mm semi-automatic pistol, bearing serial number ABG711212;
- 4) A Sig Sauer, Model P365, 9mm semi-automatic pistol, bearing serial number 66A153453;
- 5) A Canik, Model TP9SFx, 9mm semi-automatic pistol, bearing serial number 20BC24501;
- 6) A Springfield, Model XDs, 9mm semi-automatic pistol, bearing serial number BY219829;
- 7) A Glock, Model 40, 10mm semi-automatic pistol, bearing serial number BNNX268;

- 8) An FOZ, Model 75, 9mm semi-automatic pistol, bearing serial number D328535;
- 9) An EAA, Model Pavona, 9mm semi-automatic pistol, bearing serial number EAA01531;
- 10) An RIA, Model 2011, .45 caliber semi-automatic, bearing serial number RIA1498898;
- 11) A Glock, Model 23, .40 caliber semi-automatic pistol, bearing serial number BPKD312;
- 12) A CK Arms, Model P09, 9mm semi-automatic pistol, bearing serial number C530802;
- 13) A CK Arms, Model P10F, 9mm semi-automatic pistol, bearing serial number D304915;
- 14) A Canik, Model TP9SFX, 9mm semi-automatic pistol, bearing serial number 20BC28270;
- 15) A Glock, Model 43X, 9mm semi-automatic pistol, bearing serial number BPTR42;
- 16) A Ruger American, 9mm semi-automatic pistol, bearing serial number 863-05091;
- 17) An SCCY, Model CPX-2, 9mm semi-automatic pistol, bearing serial number C007925;
- 18) A Smith & Wesson, Model MP20, 9mm semi-automatic pistol, bearing serial number NHB1077; and

19) A Glock, Model 23, .40 caliber semi-automatic pistol, bearing serial number AESP709.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:



GRAND JURY FOREPERSON

 for
JENNIFER ARBITTIER WILLIAMS
ACTING UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

SHARON JONES

INDICTMENT


Counts

18 U.S.C. §§ 922(a)(1)(A), 924(a)(1)(D) (dealing in firearms without a license – 1 count)

18 U.S.C. § 924(a)(1)(A) (making false statements to a federal firearms licensee – 6 counts)

Notice of Forfeiture


Foreman

 in open court on 21 day,
A.D. 20 21

Clerk

Bail, \$ _____